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7  
8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 Dustin Neff, an individual,  
11 Plaintiff,

12 v.

13 SBA Entertainment, LLC; et al.,  
14  
15 Defendants.  
16

Case No.: 23-cv-02518-JD  
H. Judge James Donato Presiding

**JOINT STIPULATION TO  
CONTINUE THE SCHEDULING  
CONFERENCE; DECLARATION  
OF FRANK R. TRECHSEL, ESQ.**

***[(Proposed) Order Filed  
Concurrently Herewith]***

TO THE COURT, ALL PARTIES, AND ATTORNEYS OF RECORD:

PLEASE TAKE NOTE THAT, pursuant to Local Rule 7-1, Plaintiff Dustin Neff (“Neff”) and Defendant Goode Enterprise Solutions, Inc. (“Defendant” or “Goode”) hereby stipulate, by and through their respective counsel of record, that good cause exists to continue, as set forth herein, or to another date convenient to the Court’s calendar, the scheduling conference in this matter, or in the alternative allow for remote appearance by counsel.

No other dates have yet been set in this matter, so a continuance of this date need not otherwise disrupt the Court’s calendar. The parties respectfully request that the Court continue the scheduling conference by 30 days as proposed below or to another date as might be convenient for the Court:

<u>Event</u>	<u>Current Date</u>	<u>Requested Date</u>
Scheduling Conference	August 24, 2023	September 25, 2023

Good cause exists for this continuance. Neff’s lead counsel has a conflict on the current Case Management Conference date of August 24, 2023 and will be travelling that day for a trip scheduled before the conference date was set. Neff’s counsel has attempted to rearrange his schedule but has been unable to do so and thus respectfully requests a 30-day continuance of the Case Management Hearing to September 25, 2023. In the alternative, Neff’s counsel requests the court allow the parties appear for the hearing remotely to accommodate the scheduling conflict.

Goode’s counsel stipulates and agrees with Neff’s counsel’s request for the continuance. Undersigned counsel for Goode similarly has a previously-scheduled out-of-town meeting that conflicts with the Scheduling Conference as currently set. In the alternative, Goode’s counsel requests the court allow the parties appear for the hearing remotely to accommodate the scheduling conflict.

1 The Parties concurrently provide their Joint Case Management Statement  
2 today, August 17, 2023, seven days before the current hearing date and will not need  
3 additional time should the Court continue the hearing.

4 No other deadlines or events are currently scheduled, so granting this  
5 stipulation need not impact any other aspect of the Court's calendar. The parties  
6 respectfully request that the Court continue the scheduling conference as proposed, or  
7 to another date convenient to the Court, or, in the alternative, allow the Parties to  
8 appear remotely.

9  
10 SO STIPULATED.

11  
12 Respectfully submitted,

13  
14 Dated: August 17, 2023 By: /s/ Frank R. Trechsel  
15 Frank R. Trechsel, Esq.  
16 Scott Alan Burroughs, Esq.  
17 DONIGER / BURROUGHS  
18 *Attorneys for Plaintiff*

19 Dated: August 17, 2023 By: /s Valerie A. Yanaros, Esq.  
20 Valerie Yanaros, Esq.  
21 Texas Bar No. 24075628  
22 Applying to Appear Pro Hac Vice in the  
23 Northern District Court of California  
24 Yanaros Law, P.C.  
25 8300 Douglas Avenue Suite 800  
26 Dallas, Texas 75225  
27 Telephone: (512) 826-7553  
28 [valerie@yanaroslaw.com](mailto:valerie@yanaroslaw.com)

1 Pursuant to Civil L.R. 54-4.3.4(a)(2)(i), the filer attests that all other  
2 signatories listed, and on whose behalf this filing is submitted, concur in the filing's  
3 content and have authorized the filing.  
4

5  
6 Dated: August 17, 2023

By: /s/ Frank R. Trechsel  
Frank R. Trechsel, Esq.

**DECLARATION OF FRANK R. TRECHSEL, ESQ.**

I, Frank R. Trechsel, Esq., am an attorney at DONIGER / BURROUGHS, which represents Plaintiff Dustin Neff in this action. I have personal knowledge of each of the following facts stated in this declaration:

1. The parties have met and conferred with respect to the filing of the Parties' joint 26(f) report and intend to file on August 17, 2023.

2. I have a conflict with the current August 24, 2023 hearing date and will be travelling on that date for a trip scheduled before the court issued the current scheduling order.

3. I have attempted to re-arrange my schedule but have been unable to do so.

4. I cannot appear in person on August 24, 2023, but should the court decline to continue the scheduling conference, I can make myself available to appear remotely.

I declare under penalty of perjury under the law of the State of California and the United States of America that the foregoing is true and correct. Executed on August 17, 2023 in Venice, California.

By: /s/ Frank R. Trechsel  
Frank R. Trechsel, Esq.  
Declarant